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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS DIVISION**

ANDREW PERRY,)	Case No: 2:18-cv-01192-GMN-VCF
)	
Plaintiff)	
)	STIPULATION FOR EXTENSION OF
v.)	TIME TO FILE DEFENDANT'S CROSS
)	MOTION TO AFFIRM
NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security,)	(First Request)
)	
Defendant.)	

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests an extension of time of thirty days from November 13, 2018 to December 13, 2018, to prepare and file her cross motion to affirm. This is the Commissioner's first request for an extension.

Defendant respectfully requests this extension of time because of a very heavy workload, including the recent completion of three district court merits hearings, which necessitated significant additional preparation time.

1 On November 13, 2018, Plaintiff's counsel informed Defendant by email that he had no
2 objection to this extension.

3
4 Respectfully submitted,

5 Date: November 13, 2018

ROHLFING & KALAGIAN, LLP

6 By: /s/* Marc V. Kalagian
7 MARC V. KALAGIAN
8 *authorized by email November 13, 2018

9 Attorneys for Plaintiff

10 Date: November 13, 2018

DAYLE ELIESON
United States Attorney

11 By: /s/ Michael K. Marriott
12 MICHAEL K. MARRIOTT
13 Assistant Regional Counsel

14 Attorneys for Defendant

15 Of Counsel
16 Jeffrey Chen
17 Assistant Regional Counsel
18 Social Security Administration
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20 IT IS SO ORDERED.

21
22 DATE: 11-13-2018


HONORABLE CAM FERENBACH
United States Magistrate Judge

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CERTIFICATE OF SERVICE

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Marc V. Kalagian
Rohlfing & Kalagian, LLP
12631 E. Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670

Date: November 13, 2018

DAYLE ELIESON
United States Attorney

By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Assistant Regional Counsel

Attorneys for Defendant